



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

SEP 11 1992

CERTIFIED MAIL

Return Receipt Requested

Article Number: P 679 717 536

Ms. Elizabeth McBee
General Electric Company
Switchgear Operation
510 E. Agency Road
West Burlington, Iowa 52655

Re: Request for Closure Plan for
General Electric Company - Switchgear Operation
West Burlington, Iowa
EPA ID No. IAD005272703

Dear Ms. McBee:

The purpose of this letter is to provide notification that General Electric is required to submit a hazardous waste management unit closure plan to the U. S. Environmental Protection Agency (EPA) Region VII on or before November 23, 1992. This closure plan must comply with the applicable requirements specified in Title 40 Code of Federal Regulations (CFR) Part 265.

The submission of this closure plan is required because General Electric previously applied for and achieved Interim Status to operate a hazardous waste treatment/storage facility but later withdrew the Part B permit application which had been submitted to EPA prior to November 8, 1988. Therefore, in accordance with 40 CFR §§ 265.112(d)(3)(i), 270.10(e)(5), and 270.73(g), after November 8, 1992, General Electric may no longer operate its Interim Status treatment/storage units, and must provide a closure plan to EPA by November 23, 1992 for all such interim status units.

The formal process for administratively terminating your facility's Interim Status in accordance with the permit denial procedures specified in 40 CFR Part 124 will not be undertaken until the need for corrective action at your facility has been assessed.

Upon receipt of your closure plan, EPA will review it to determine if revisions or modifications are necessary in order

RCRA



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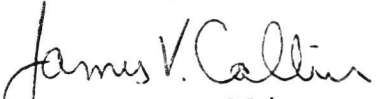


for it to comply with the requirements specified in 40 CFR Part 265. Once a tentative decision has been reached to approve the plan, the plan must be made available for public comment for a period of thirty (30) days, as required by 40 CFR § 265.112(d)(4). Any comments received must be addressed before final approval can be granted. Upon final approval, the plan is to be implemented.

If you have already submitted a closure plan to EPA which you believe complies with all the requirements specified in 40 CFR Part 265, and you do not plan to submit a revised plan, please inform Mr. Don Lininger, of my staff. Don may be reached at (913) 551-7724. Please note that regardless of whether your closure plan is approved by EPA by November 8, 1992, the Interim Status units may no longer be operated after that date.

Enclosed you will find a list of those elements which must be included in a closure plan in order for EPA to approve the plan. Please send your closure plan to the attention of Don Lininger at the letterhead address. If you have any questions, please contact Don at the telephone number given above.

Sincerely,


James V. Callier
Chief, Iowa Section
RCRA Branch

Enclosure

cc: Pete Hamlin, IDNR

ELEMENTS TO BE INCLUDED IN CLOSURE PLAN

The following elements must be included/addressed in a container storage closure plan. (Additional elements may need to be included in closure plans for other types of hazardous waste management units.)

1. DESCRIPTION OF UNIT(S)

Detailed description of all units to be closed;

Number of Units, type of units, detailed description of the unit(s) and the facility including scaled (or adequately dimensioned diagrams)

- the base material construction (e.g., asphalt, concrete, earth, gravel, wood, etc);
- the condition of the base (cracks, holes, etc);
- the slope or gradient of the base or pad (where would runoff/runon collect?);
- the location of the unit at the facility (indicate if it is indoors or outdoors; if outdoors, is it covered?);
- the size and boundaries of the unit(s) and the area subject to closure.

2. QUANTITY/TYPE OF WASTE MANAGED IN UNIT

Maximum waste inventory/capacity of the unit. Identify all hazardous waste codes/hazardous constituents that have been managed at the unit.

3. DECONTAMINATION ACTIVITIES

a. DETAILED DESCRIPTION OF DECONTAMINATION ACTIVITIES

Detailed description of the proposed activities (e.g., cleaning, washing, rinsing) which will be used to decontaminate equipment and structures (e.g., concrete pads, floors, walls, tanks, etc.).

b. ACTION LEVELS FOR DECONTAMINATION ACTIVITIES

Action levels for each hazardous constituent in the final decontamination/rinsewater that will be used to determine if decontamination was successful. If the action level in the final rinse water is exceeded, the decontamination procedures must be

repeated until the action level is met or removal occurs. (Option -wipe samples used in lieu of, or in addition to, rinsewater analysis.)

4. SOIL SAMPLING PLAN

Detailed plan for sampling the soil beneath or surrounding the unit including the number, locations, and rationale for selecting locations for all soil samples to be collected and the depth intervals from which samples are to be collected. If soil sampling is not necessary because of the nature of the wastes or unit, (example: unit is located inside a building and no release/migration pathway is present) a detailed justification must be provided.

5. CLOSURE PERFORMANCE STANDARDS

Closure performance standard, or clean-up target level, for each hazardous constituent in each applicable environmental media (e.g., soil, groundwater). The basis for the closure performance standard may be either local naturally occurring background levels or EPA approved health based levels. The justification for selecting each standard must also be provided in the closure plan.

6. CONTINGENT ACTIVITIES

Describe any contingent activities, such as soil excavation, which would be required if the results of inspection indicate that a release of hazardous waste from the unit may have occurred or if the results of sampling indicate that the performance standard have been exceeded.

7. MANAGEMENT OF WASTES (AND CONTAMINATED ENVIRONMENTAL MEDIA) GENERATED DURING CLOSURE PLAN IMPLEMENTATION

All waste streams generated during closure implementation (e.g., decontamination wash/rinsewater, disposable gloves, contaminated soil, etc.) are subject to the determination requirements at 40 CFR § 262.11. Wastes determined to be hazardous are subject to the applicable regulations. In particular, 40 CFR § 262.34 allows generators to accumulate hazardous wastes in tanks or containers for up to 90 days, or as otherwise specified. No hazardous wastes may be stored within the boundaries of the unit undergoing closure once closure has commenced, and until EPA has approved the closure certification.

8. ANALYTICAL PROCEDURES

For all sample analyses (soil sampling, decon/rinsewater analysis, etc.), specify analytical procedures which will be used. Analytical procedures are to be selected from EPA SW-846, unless otherwise approved by EPA. Specify quality assurance and control procedures (e.g., sample collection techniques, chain of custody procedures, use of duplicates, spikes and blanks) that will be used to verify the accuracy and validity of the work that is completed.

9. CLOSURE SCHEDULE

A schedule of the activities that will be conducted upon EPA approval of the plan which provides for the completion of all activities within 180 days of closure plan final approval, submission to EPA of a closure certification as specified in 40 CFR Subpart G within 60 days of completion of closure activities, and providing to EPA 30 days advance written notice of sampling activities. Requests for changes to the schedule after plan approval, including extensions, must be made in advance in writing to EPA and must state the reason the change is needed. Such changes are subject to EPA approval.

10. CLOSURE CERTIFICATION

A provision requiring that supporting documentation will be submitted to EPA with the certification statements (one from owner/operator and one from independent P.E.) which includes photos, lab analysis reports, narrative, etc. (Examples of certification statements attached.)

11. CLOSURE COST ESTIMATE

Include with closure plan, a copy of the closure cost estimate required by 40 CFR Parts 264/265 Subpart H. Cost estimate should be itemized, preferably by activities which are matched to milestones specified in the closure schedule.

OWNER OR OPERATOR CLOSURE CERTIFICATION

The undersigned, _____ (Name of Owner or Operator),
a (1) Corporation, incorporated under the laws in the State of _____
and licensed to do business in _____, or
(2) (Partnership, Individual, Municipality or Other Entity), with
its principal place of business at _____ (Address),
which formerly owned or operated a hazardous waste (Description
of Hazardous Waste Activity) (hereinafter "Facility") known as
_____ (Name of Hazardous Waste Facility)
and located at _____ (Location), in
_____ County, _____ (State), has completed and
permanently ceased the active operation of the facility and has
fully implemented all measures relating to the closure of the
facility as set forth in the Closure Plan approved by the U. S.
Environmental Protection Agency (EPA) for said facility.

NOW, THEREFORE, I (we) _____ (Name of Owner/Operator)
hereby swear and affirm that the above-named hazardous waste
facility has been closed in accordance with the facility's
Closure Plan approved in writing by EPA on _____, 19____,
that all measures relating to the closure of the facility
required by the Closure Plan and the rules and regulations of
(regulatory citation) have been fully implemented, and that to
the best of my (our) knowledge, no been fully implemented, and
that to the best of my (our) knowledge, no violations continue to
exist that may have arisen prior to closure.

(Signature)

(Title)

(Address)

Taken, sworn and subscribed before me, this
_____ day of _____ 19____

(Notary)

**INDEPENDENT REGISTERED PROFESSIONAL ENGINEER
CLOSURE CERTIFICATION**

I, _____ (Name), a
Professional Engineer registered pursuant to the Professional
Engineers Registration Law, _____, hereby certify that I
have reviewed the Closure Plan for the _____ (Type
of Facility) at _____ (Name of Hazardous
Waste Facility) _____ ("facility"), located at
_____ (Location), that I am
familiar with the rules and regulations of (regulatory citation)
pertaining to closure of such facility, and that I personally
have made visual inspection(s) of the aforementioned facility,
and that the closure plan of the aforementioned facility has been
performed in full and complete accordance with the facility's
closure plan approved in writing by the U. S. Environmental
Protection Agency (EPA) on _____, 19__, and the rules
and regulations of (regulatory citation).

(Signature)

(Date)

(Professional Engineering License Number)

(Business Address)

(Seal)

(Telephone Number)

United States Postal Service

Official Business

KANSAS CITY, KS GNF 09/15/92 23:31



PENALTY FOR PRIVATE
USE, \$300

Print your name, address and ZIP Code here

U.S. EPA Region VII
RCRA Branch/IOWA Sec.
726 Minnesota Ave.
Kansas City, KS 66101

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SEP 11 1992

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

ALW
USE ZIP CODE **E**

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address

2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Ms. Elizabeth McBee
General Electric Company
Switchgear Operation
510 E. Agency Road
West Burlington, IA 52655

4a. Article Number

P 679 717 536

4b. Service Type

☐ Registered

☐ Insured

☐ Certified

☐ COD

☐ Express Mail

☐ Return Receipt for Merchandise

7. Date of Delivery

9/14/92

5. Signature (Addressee)

Sta. Mst

6. Signature (Agent)

Burl Corp Co

8. Addressee's Address (Only if requested and fee is paid)